

Martin W. Aron (MA 2008)
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBIN WINSTON,

08-CV-4072 (PKC) (HBP)

Plaintiff,

v.

RULE 26(a)(1) DISCLOSURES

VERIZON SERVICES CORP.

Defendant.

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, defendant Verizon Services Corp., ("Verizon") submits the following initial disclosures. The responses set forth herein constitute the best information presently available to Verizon. Verizon has not completed its investigation of the facts underlying this lawsuit, however, nor has it completed its discovery or preparation of this case for trial. Accordingly, these responses are provided without prejudice to Verizon's right to amend, supplement, or change said responses if and when additional, different, or more accurate information becomes available. The responses are also subject to correction for inadvertent errors or omissions, if any such errors or omissions are later found to exist.

A. Individuals likely to have discoverable information that Verizon may use to support its defenses, unless solely for impeachment:

The following individuals may have knowledge about the facts allegedly giving rise to the claims asserted in the Complaint and/or defenses thereto, and can be reached c/o Martin W. Aron, Esq. Edwards Angell Palmer & Dodge LPP, 750 Lexington Avenue, New York, New York 10022 (212) 308-4411:

- Robin Winston
- Kevin Organ
- Cynthia Germanotta
- Patrick Koseski
- Marguerite Ropke
- Anthony Rusin
- Linda Mazarella, Credit Suisse
- Any fact witness named by plaintiff
- Verizon EAP Personnel

These individuals are all past or present employees of Verizon or Verizon subsidiaries (except where indicated). These individuals may have knowledge regarding the plaintiff's employment with Verizon, including but not limited to plaintiff's allegations in the Complaint, the facts and circumstances surrounding those allegations, and related issues. Verizon reserves the right to amend this list and reserves the right to call any individuals identified by plaintiff in his complaint or her discovery responses.

B. Documents That Support Idearc's Defenses:

Verizon has in its possession and will make available for inspection and copying, upon execution of an appropriate Protective Order, documents in the following categories:

- Plaintiff's personnel file
- Plaintiff's time records, salary and wage records, benefits records, payroll records, and W-2 forms
- Internal communications and other documents concerning plaintiff's employment, plaintiff's job description and performance, plaintiff's termination from employment and the allegations in plaintiff's complaint
- Company policies and procedures, including employee manuals,

disciplinary policies and grievance procedures that were in effect during plaintiff's employment

- Company documents that relate to the investigation of plaintiff's pre-litigation complaints of discrimination

C. Damages Calculation:

Verizon does not claim any damages, except entitlement to reimbursement of its attorneys' fees and costs pursuant to Rule 11 of the Federal Rules of Civil Procedure, due to the frivolous nature of this lawsuit.

D. Insurance Policies:

Any such insurance policies that may exist will be available for inspection and copying at a mutually agreeable date and time, upon execution of an appropriate Protective Order.

Dated: New York, New York
July 11, 2008

s/Martin W. Aron (MA2008)

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CERTIFICATE OF SERVICE

I certify that I caused a copy of the foregoing disclosures to be served this 11th day of July 2008, via U.S. mail, first class, postage prepaid upon:

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